

**APPENDIX A****TRINITY ANNUAL CONFERENCE  
WHISTLE-BLOWING POLICY****1. FOREWORD**

- 1.1 This Whistle-Blowing Policy applies to Trinity Annual Conference (TRAC).
- 1.2 The objectives of this policy are:
  - 1.2.1 to provide a platform for employees, volunteers, business partners, and other stakeholders to duly disclose mismanagement, corruption, illegality or some other wrong doing, in the organisation.
  - 1.2.2 to ensure that such concerns are treated seriously and appropriately, and
  - 1.2.3 to ensure that any person(s) raising such concerns in good faith will be protected from reprisals or retaliation.
- 1.3 TRAC envisages an environment where timely and appropriate actions are taken to deal with misconduct or malpractice, thereby propagating a culture of integrity and transparency. By providing a clear procedure to report and investigate any suspicion of misconduct and/or any breach of law or regulation, we are also protecting TRAC from exposure to regulatory and/or criminal liability that may result in reputational or financial loss.
- 1.4 Whistle-blowing is the disclosure by a person who is usually an employee in an organisation, termed a whistle-blower, of mismanagement, corruption, illegality, or some other wrongdoing within the organisation.
- 1.5 The Board of Governance (BOG) is responsible for initiating any reviews and update to these guidelines.

**2. SCOPE**

- 2.1 This policy outlines the reporting process for serious and sensitive concerns, defined as any (or suspicion of) misconduct, irregularity, breach of law, regulation, code, principle, or policy, that could have an adverse impact on the operations and performance of TRAC and which, due to the nature of the concern, cannot be reported through the normal reporting line.
- 2.2 This policy does not cover grievances. Grievance deals with an individual or personal matter and is not a whistle-blowing concern. Grievance will be handled as per Grievance Procedures within the Human Resources Manual.
- 2.3 This policy relies upon the reasonable belief of employees, volunteers, business partners, and other stakeholders, and should not be used as a mechanism for raising malicious or unfounded allegations against colleagues.
- 2.4 The nature of the concerns (known or suspected misconduct) covers any of the following acts, including but not limited to:

**APPENDIX A**

- 2.4.1 abuse of power or authority;
  - 2.4.2 financial fraud e.g. misappropriation of assets, embezzlement of funds, accounting manipulation;
  - 2.4.3 non-compliance with internal controls procedure or Code of Conduct;
  - 2.4.4 material conflicts of interest without disclosure;
  - 2.4.5 bribery and corruption e.g. inappropriate personal gain, gift, or facilitation payments;
  - 2.4.6 serious endangerment to environment, health, and safety of individuals;
  - 2.4.7 breach of law and justice;
  - 2.4.8 improper conduct;
  - 2.4.9 concealment, or deliberate failure to report, a known control breach or weakness.
- 2.5 Benefits to TRAC:
- 2.5.1 Increases the likelihood of alerting management to problems so that these concerns can be addressed before damage is done or further damage prevented;
  - 2.5.2 Helps to deter employees / volunteers from engaging in irregularities by strengthening the atmosphere of openness, transparency, and integrity.

**3. REPORTING PROCEDURE**

- 3.1 TRAC encourages whistle-blowers to put their names to their submission. Concerns expressed anonymously are more difficult to act upon effectively, but they will be considered, taking into account the seriousness and credibility of the issue raised and the likelihood of confirming the allegation from attributable sources and information provided.
- 3.2 Whistle blower may make report via email to: [whistleblow@trac-mcs.org.sg](mailto:whistleblow@trac-mcs.org.sg) or submit a written and sealed report, marked "Private & Confidential" to TRAC Office, attention to: Board of Governance Chairperson ("BOG Chairperson"), and TRAC Vice-President.
- 3.3 As it is essential for TRAC to have all critical information in order to be able to efficiently evaluate and investigate a complaint, the report on concerns made should provide as much detail and be as specific as possible. The report (Refer to Whistle-blower Report Form in FORM-I) should include:
  - 3.3.1 background, history, and reason for the concern;
  - 3.3.2 dates or period of time;
  - 3.3.3 nature of concern;
  - 3.3.4 name of the person involved in the events;

**APPENDIX A**

- 3.3.5 evidence substantiating the concern e.g. documents, e-mails, voice loggings, or witness;
- 3.3.6 contact details (in case further information is required).
- 3.4 The whistle-blower who reports a concern must meet any reasonable request to clarify any facts and/or circumstances, to provide (additional) information, and to cooperate with an investigation. A lack of information can be a reason to decide not to conduct an investigation and/or to conclude that the concern has no factual basis.
- 3.5 The whistle-blower is required to keep all information confidential.
- 3.6 Allegations made in bad faith may result in disciplinary or other appropriate action.
- 3.7 TRAC will ensure that no disciplinary measures or other steps will be taken against the whistle-blower in case a concern made in good faith later turns out to be mistaken, misguided, or inconclusive.
- 4. HANDLING OF REPORTING AND INVESTIGATION**
- 4.1 All concerns received in accordance to Section 3.2 above, will be directed to the BOG Chairperson who will forward the whistle-blower report to the relevant personnel responsible for investigation.
- 4.2 Upon receipt of concerns either via whistle-blower report or email, the BOG Chairperson should:
  - 4.2.1 record all reported concerns in a master register;
  - 4.2.2 inform the BOG of the whistle-blowing concern;
  - 4.2.3 review the details provided by the whistle-blower;
  - 4.2.4 consider the seriousness and credibility of the concern raised;
  - 4.2.5 arrange meeting of BOG on further action to be taken;
  - 4.2.6 send an acknowledgement to the whistle-blower that the concern is received.
- 4.3 The BOG will decide on the action to be taken with respect to the concern raised.
- 4.4 The BOG in consultation with TRAC reserves the right to refer any concerns at any time to the appropriate external regulatory authorities.
- 4.5 Depending on the nature of the concern, the BOG Chairperson may inform the subject of the concern of the allegations against him/her and provide him/her with an opportunity to reply to such allegations. Any such communication must be strictly confidential and must preserve the anonymity of the whistle-blower.

**APPENDIX A**

- 4.6 All concerns received in accordance to paragraph 3.2 will be reviewed as provided in paragraph 4.2 and 4.3 within a reasonable timeframe, but not in excess of 30 days unless there are exceptional circumstances that require an extension.
- 4.7 When deemed appropriate, an Inquiry Committee may be convened by BOG comprising independent TRAC Board/Committee and/or Sub-Committee members as soon as possible; but no later than 30 days from the date of the completion of the review stated in paragraph 4.6 above. The Inquiry Committee shall complete its investigations and submit its findings no later than 90 days of being convened. The Inquiry Committee may request for an extension of time to BOG to submit its findings, and BOG shall consider such requests on a case by case basis.
- 4.8 The process for the review in 4.6 till the submission of findings in 4.7 shall take no longer than 180 days from the receipt of the whistle-blower report by BOG Chairperson. The Inquiry Committee may request for an extension of time to TRAC EXBD to complete its investigations and submit its findings and TRAC EXBD shall consider such requests on a case by case basis.
- 4.9 The report of the Inquiry Committee will be reviewed by the BOG and its findings recorded.
- 4.10 BOG will decide on the appropriateness of placing any report of the Inquiry Committee, once completed, before TRAC, depending on the gravity and magnitude of the violation.
- 4.11 With regards to a whistle-blower report against a minister or lay person, the disciplinary proceedings for Inquiry Committee, Committee of Investigation and Disciplinary Panel specified in para 742-761 (minister) and para 762-774 (lay person) of the Book of Discipline shall be adopted, if applicable.

**5. REMEDIAL ACTION**

- 5.1 If, at the conclusion of an investigation, the Board of Governance determines that a violation or allegation(s) is substantiated, effective and appropriate remedial action commensurate with the severity of the offence will be taken by the appropriate authority.
- 5.2 Whistle-blower will receive an acknowledgement of the outcome.

**6. PROTECTION AND CONFIDENTIALITY**

- 6.1 TRAC will treat all concerns and issues raised under this policy in a confidential manner except to the extent necessary to conduct a complete and fair investigation or as required by law. The identity of the whistle-blower shall be kept confidential.
- 6.2 If necessary or lawful circumstances dictate the disclosure of the whistle-blower's identity, TRAC will inform the whistle-blower prior to such disclosure.

*Adapted from MCS-GC Whistle Blowing Policy, March 2019  
Revised and Approved by TRAC EXBD, 24 Oct 2019*

**APPENDIX A  
FORM-I****WHISTLEBLOWER REPORT FORM**

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact TRAC of The Methodist Church in Singapore. Please note that you may be called upon to assist in the investigation, if required.

<b>REPORTER'S CONTACT INFORMATION</b>	
NAME *	
DESIGNATION & DEPARTMENT	
CONTACT NO & EMAIL ADD *	
<b>SUSPECT'S INFORMATION</b>	
NAME *	
DESIGNATION & DEPARTMENT *	
CONTACT NO & EMAIL ADD	
<b>WITNESS'S INFORMATION (if any)</b>	
NAME	
DESIGNATION & DEPARTMENT	
CONTACT NO & EMAIL	
<b>REPORT DETAILS:</b> <i>Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</i>	
1. Nature of Concern (What is the misconduct / improper activity?) *	
2. Background, history, and reason for the concern *	
3. Time/Duration & Venue (When & Where did it happen?) *	
4. Evidence substantiating the concern? (e.g. documents, emails, voice loggings, witness, etc) *	
<b>FOR OFFICIAL USE</b>	
Report Received by	Date & Time Report Received

\* Note: Essential info required.